

The Honorable James L. Robart

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

THE HUMAN RIGHTS DEFENSE  
CENTER, et al.,  
Plaintiffs,

v.

U.S. DEPARTMENT OF HEALTH AND  
HUMAN SERVICES, et al.,  
Defendants.

CASE NO. C18-01442-JLR  
**JOINT STATUS REPORT**

Plaintiffs THE HUMAN RIGHTS DEFENSE CENTER and MICHELLE  
DILLON and Defendants U.S. DEPARTMENT OF HEALTH AND HUMAN  
SERVICES, ADMINISTRATION FOR CHILDREN AND FAMILIES, and OFFICE OF  
REFUGEE RESETTLEMENT hereby provide the Court with a Joint Status Report  
pursuant to the Court's April 11, 2019 Order (Dkt. No. 23).

As the Court is aware, Plaintiffs filed this Freedom of Information Act ("FOIA")  
action seeking certain documents from Defendants that Plaintiffs had requested pursuant  
to FOIA in August 2018. Since the last filing, the parties have worked on remedying  
technological issues that severely affect production of documents. Last week, Plaintiffs  
inquired as to whether the information technology issues could be addressed by seeking  
the requested documents from sources other than encrypted emails, which apparently

1 require email-by-email decryption. Defendants' counsel is in the process of determining  
2 whether this is a workable solution from Defendants' FOIA officers, but does not yet  
3 have a definitive answer. Counsel anticipate additional information to be exchanged in  
4 an attempt to simplify the process.

5 The parties propose a joint status report to be filed on or before June 3, 2019.

6 DATED this 6th day of May, 2019.

7  
8 Respectfully Submitted,

9  
10 ARETE LAW GROUP PLLC

11 s/ Jeremy E. Roller

12 JEREMY E. ROLLER, WSBA #32021

13 1218 Third Avenue, Suite 2100

14 Seattle, WA 98101

15 Phone: (206) 428-3250

16 Email: [jroller@aretelaw.com](mailto:jroller@aretelaw.com)

17 HUMAN RIGHTS DEFENSE CENTER

18 s/ Deborah M. Golden

19 DEBORAH M. GOLDEN (*pro hac vice*)

20 316 F Street, NE #107

21 Washington, D.C. 20002

22 Phone: (202) 543-8100

23 Email: [dgolden@humanrightsdefensecenter.org](mailto:dgolden@humanrightsdefensecenter.org)

24 *Attorneys for Plaintiffs*

25 BRIAN T. MORAN

26 United States Attorney

27 s/ Michelle R. Lambert

28 MICHELLE R. LAMBERT, NYS #4666657

Assistant United States Attorney

United States Attorney's Office

700 Stewart Street, Suite 5220

Seattle, Washington 98101

Phone: (206) 553-7970

Fax: (206) 553-4073

Email: [michelle.lambert@usdoj.gov](mailto:michelle.lambert@usdoj.gov)

*Attorneys for Defendant*

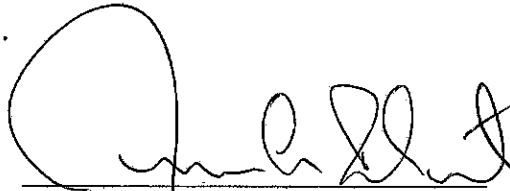
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

  
~~[PROPOSED]~~ ORDER

It is hereby ORDERED that:

The parties shall submit a joint status report to the Court on or before June 3, 2019.

Dated this 13<sup>th</sup> day of May, 2019.

  
Honorable James L. Robart  
United States District Court Judge